

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

VANIA MOORE,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.:
)	1:06CV1128-WKW
WILLSTAFF CRYSTAL, INC. d/b/a)	
WILLSTAFF WORLDWIDE,)	
)	
Defendant.)	

REPORT OF PARTIES' PLANNING MEETING

1. Pursuant to Fed. R. Civ. P. 26(f), a conference was held on January 30, 2007 and was attended by:

Maury S. Weiner	Stacey T. Bradford
Wiggins, Childs, Quinn & Pantazis, LLC	Bradley, Arant, Rose & White LLP
301 19th Street North	1819 Fifth Avenue North
Birmingham, AL 35203	Birmingham, AL 35203
One of the Attorneys for Plaintiff	One of the Attorneys for Defendant

2. Pre-Discovery Disclosures. The parties will exchange the information required by Fed. R. Civ. P. 26(a)(1) by **March 8, 2007**.

3. Discovery Plan. The parties jointly propose to the court the following discovery plan:

Discovery will be needed on the following subjects:
Plaintiff's claims and Defendant's defenses.

Disclosure or discovery of electronically stored information should be handled as follows: To the extent it exists, relevant, non-privileged electronic information will be produced by the parties in either PDF or hardcopy format, to

enable the parties to exchange discoverable information without undue burden or costs. A requesting party may obtain relevant, non-privileged electronic information in a format other than PDF or hardcopy only upon agreement by the parties or a showing of substantial need to the Court for such information in that format.

If it becomes necessary through the course of discovery the parties will agree to an order regarding claims of privilege or of protection as trial-preparation material asserted after production.

All discovery commenced in time to be completed by **November 2, 2007**.

Maximum of 30 interrogatories by each party to any other party. Responses due 30 days after service.

Maximum of 30 requests for admission by each party to any other party. Responses due 30 days after service.

Maximum of 10 depositions by plaintiff and 10 by defendant. Each deposition shall be limited to maximum of 7 hours unless extended by agreement of parties.

Reports from retained experts under Rule 26(a)(2) due:

From plaintiff by **June 22, 2007**.

From defendant(s) by **July 20, 2007**.

Supplementations under Rule 26(e) due within 20 days of discovery of the information, but in any event not later than 30 days prior to the close of discovery.

4. The parties do not request a scheduling conference with the Court before entry of the scheduling order.

5. The parties request a pretrial conference in **December 2007**.

6. Plaintiff should be allowed until **April 20, 2007** to join additional parties and until **April 20, 2007** to amend the pleadings.

7. Defendants should be allowed until **May 18, 2007** to join additional parties and until **May 18, 2007** to amend the pleadings.

8. All potentially dispositive motions should be filed by **September 11, 2007**.

9. Settlement cannot be evaluated prior to some initial discovery.

10. Final lists of witnesses and exhibits under Rule 26(a)(3) should be due:

From plaintiff: **December 7, 2007;**

From defendant: **December 7, 2007.**

11. Parties should have 14 days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).

12. The case should be ready for trial by **January 7, 2008**, which at this time is expected to take approximately 3-4 days.

Date: 1/30/07

/s/ Maury S. Weiner

Jon C. Goldfarb

Maury S. Weiner

Ethan R. Dettling

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/s/ Stacey T. Bradford

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WillStaff Crystal, Inc.